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Donald C. Brittingham
Director – Wireless/Spectrum Policy

October 12, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Presentation
WT Docket No. 03-103; “Air-Ground Telecommunications Services”

Dear Ms. Dortch:

At the request of Verizon Airfone, the attached technical paper was prepared to address questions about the viability of providing a broadband Air-to-Ground (“ATG”) service from take-off to landing (“deck-to-deck”) if the Commission were to implement the band-sharing scheme proposed by AirCell.

On September 30, 2004, AirCell filed an ex parte with the Commission that included a paper entitled “Providing Deck-to-Deck Coverage.” In that submission, AirCell attempts to show that providing “deck-to-deck” coverage in the vicinity of airports is readily achievable under its band-sharing proposal. However, as demonstrated in the attached technical assessment by Telcordia Technologies, AirCell’s paper provides no support for such a claim.

The AirCell paper addresses the potential for cross-duplexing to create harmful interference between competing base stations located near airports, and proposes a set of rules designed to manage this interference. These proposed rules are extremely rigid and impractical, and would make it difficult to deploy a cost effective ATG network. However, as Telcordia describes in its paper, AirCell’s analysis is flawed. Even if its proposed rules could be successfully implemented, the use of cross-duplexed base stations would result in interference that would reduce the reverse link capacity by 67%.

AirCell's paper also ignores other issues that would impact the ability of an ATG operator to provide "deck-to-deck" coverage under its proposal. For example, the paper does not address the difficulty in achieving polarization isolation under AirCell's cross polarization proposal, nor does it address how strict power limits would impact the deployment of a broadband service.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham
Donald C. Brittingham

Attachment

cc:	Bryan Tramont	Richard Arsenault
	Sheryl Wilkerson	Kathy Harris
	Sam Feder	Jay Jackson
	Jennifer Manner	Roger Noel
	Paul Margie	Julius Knapp
	Barry Ohlson	James Schlichting
	John Muleta	Ira Keltz
	Peter Tenhula	Ron Chase
	David Furth	Ahmed Lahjouji
	Shellie Blakeney	Salomon Satche
	Gregory Vadas	